

As a communications engineer and a licensed radio amateur, I believe it to be premature at this time for the Commission to proceed further with allowing further broadband internet access over power lines except for conducting extensive testing of its interference potential for existing licensed radio services. There are several reasons for my belief, the two foremost being that there is a high probability of interference to existing, licensed users of the radio spectrum and the questionable viability of the market for such service.

First, the Commission has the responsibility of protecting United States users of the radio spectrum from harmful interference. Tests abroad have shown that broadband internet access schemes using power lines as the transmission medium do cause harmful interference to licensed users of the high frequency and very high frequency segments of the radio spectrum. There appears to have very little, if any, such testing conducted in the United States to date. In order to fulfill its responsibility to protect these users, the Commission must conduct a comprehensive and eextensive test program with full involvement of ALL users, both commercial and Government, of the portion of the spectrum which would be affected by transmission of broadband internet over power lines and obtain the agreement of ALL such parties prior to further progressing the matter of broadband internet access over power lines.

Second, there is considerable question regarding the size and scope of the market within the United States for yet one more technique of providing broadband internet access. Currently, users have at least three choices for such access. These include DSL over the public telephony infrastructure, access via the widely available cable television infrastructure and radio in the 50 MHz wide 3.65 to 3.70 GHz frequency band. However, the exceedingly slow takeup of the third alternative, and the recent price reductions for services using the first two alternatives, call the viability of the market for yet one more broadband internet access technology into question.

Accordingly, I believe that it is premature for the Commission to progress broadband internet provision over power lines until comprehensive and full testing involving ALL current users of the affected portion of the radio spectrum demonstrates conclusively that harmful interference will not occur and that the viability of the market for one more broadband internet access technique has been confirmed.

Calvin B. Cotner